The Abstract has been amended to remove a semicolon on line 3. Previously, such semicolon had erroneously suggested that the phrase "specifying the structure . . ." was a separate step rather than a description of the resource-specifying source recited in the reading step.

Claim 2 has been amended to recite that the method steps of claim 1 are performed "on a computer system" (page 10, line 9) and that what is automatically triggered is a semantic evaluation "by said system" of the contents of a resource being updated.

Claims 1-12 again stand rejected under 35 U.S.C. § 102(e) as being anticipated by the published U.S. patent application (US 2003/0208473 A1) of Lennon ("Lennon") (paper no. 11, ¶ 2, page 3). Again, this rejection is respectfully traversed as being unsupported by the reference. In the remarks below, applicants will address the rejection first as it relates to claims 1-12 generally, then as it relates specifically to claim 2.

Claims 1-12

As previously noted, all of the claims under rejection depend, directly or indirectly, on claim 1. As defined in claim 1 as currently amended, applicants' invention relates to a method for providing access to resources (32, 33) for the purpose of updating the resources (page 3, lines 11-13). In accordance with the invention, physical and/or logical parameters required for locating a desired resource are defined, and resource-specific information (e.g., an XML schema) is read from a resource-specifying source (42, 44) specifying a structure containing the resource (step 330). Hierarchical control information (10) reflecting the structure is generated using the resource-specific information (step 340), and access to the desired resource to update the resource is enabled by calling a resource access performer (30) with at least one of the parameters and evaluating the control information (steps 350-390). By handing off the actual resource access to the performer in this manner, the present invention allows a resource to be accessed without modifying or recompiling a user program, even if a resource or attribute has been added or modified.

Lennon describes a method of browsing electronically accessible resources using descriptions of the resources. As described in paragraph [0009] of the reference, the descriptions have descriptor components having attributes representative of at least two axes of access to the resources, as well as links to the corresponding electronically accessible resources. In accordance with the described method, the descriptions are read and items are displayed, where each item is associated with a corresponding descriptor component of a read description that has at least one such attribute, and the descriptions of the resources and their corresponding electronically accessible resources are browsed via the links using the displayed items.

Lennon's system is thus designed for browsing, searching, locating and annotating electronically accessible resources. It does not relate to a system for updating such resources as claimed by applicants.[1]

In his latest action, the Examiner counters that Lennon does indeed teach updating resources as claimed by applicants (paper no. 11, ¶ 4, pages 5-6). Thus, the Examiner points to paragraph [0436] on page 32, which discusses adding a new digital video resource to the digital video browser system shown in Fig. 16. The Examiner also points to paragraph [0443] on the same page, which discusses appending a newly described digital resource to an existing collection of described digital video resources known as the digital video library. However, in each of these examples, a resource is being <u>added</u> to a system or to a collection of resources. This does not imply that the resource is also being <u>updated</u>.

It is true that Lennon's system as a whole may be updated by the addition of a resource. However, applicants' claims are directed to the updating of an individual <u>resource</u>, not a system or other entity <u>containing</u> the resource. And while Lennon notes in paragraph [0443] that the digital video library "is itself a resource able to be described", that expansive notion of a resource conflicts with the language of claim 1, which speaks of reading resource-specific information "from a resource-specifying source specifying a structure <u>containing said resource</u>".

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[1] While Lennon mentions updating at [0252], [0263], [0388] [0449], and [0503], the things being updated are apparently the resource descriptions rather than the resources themselves.

If the structure in question is the resource, it cannot fairly be said to contain the resource as recited in applicants' claim. Thus, the "resource" of claim 1 is an individual resource, such as might be located at a node of a tree, and not the tree itself.[2]

Therefore, neither of the examples cited by the Examiner is apposite to updating a resource as claimed by applicants, and the Examiner's reliance on these examples is misplaced. Hence, Lennon neither anticipates nor renders obvious claims 1-12 as amended.

Claim 2

Claim 2 as amended recites that the method steps of claim 1 are performed "on a computer system" (page 10, line 9) and recites the further step of "automatically triggering a semantic evaluation by said system of the contents of a resource desired to be updated when said resource is referenced in calling said resource access performer" (page 6, lines 25-26). As noted in the specification, this allows for consistent updates when there are interdependencies between related data, and is of particular importance when the same resource is shared between a plurality of operating systems or generally when the data is distributed over a plurality of locations in a network (lines 26-29).

In his latest action, the Examiner asserts that Lennon does in fact teach the automatic triggering step of claim 2, citing paragraph [0116] on page 9 and paragraph [0439] on page 32 of the reference (paper no. 11, ¶ 4, pages 6-7).

Paragraph [0116], previously cited by the Examiner, notes how the disclosed Description Object Model (DesOM) "provides the core semantics of the description and is based on the descriptor entity." However, merely providing "core semantics" implies nothing about semantically evaluating the contents of a resource being updated, much less automatically triggering such evaluation when a resource desired to be updated is referenced.

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[2] Applicants' specification also arguably refers to "resources" broadly at times (e.g., page 1, lines 18-21), but this language in the specification is clearly trumped by claim language pointing to a narrower construction.

In paragraph [0439], Lennon notes that the Shot descriptor D3 "has an associated descriptor handler D4 which provides a method to automatically select a key frame from a specific shot <u>and then generate a series of semantic labels</u> which provide some information about the content of the particular shot (e.g., whether or not the shot contained people, was an indoors or outdoors shot, etc.)" (emphasis added). These semantic labels, however, are entirely at the discretion of the user, and Lennon's system cannot itself (without some sort of artificial intelligence capability not hinted at) verify whether or not a shot contains people, is indoors or outdoors or the like. Accordingly, there is no semantic evaluation <u>by the system,</u> automatically triggered or otherwise. Therefore, paragraph [0439] of Lennon likewise fails to teach the subject matter of claim 2 as amended.
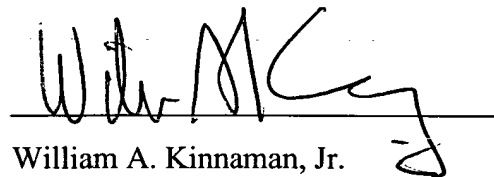
Conclusion

For the foregoing reasons, applicants respectfully submit that claims 1-12 as amended distinguish patentably over the art cited by the Examiner.

Reconsideration of the application as amended is respectfully requested. It is hoped that upon such consideration the Examiner will hold all claims allowable and pass the case to issue at an early date. Such action is earnestly solicited.

Respectfully submitted,

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